UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: NOV 0 2 2004

SUBJECT: Preliminary Site Assessment Report
Cooper Industries, Inc.

FROM: Mindy J. Pensak, Coordinator
Biological Technical Assistance Group (DESA-HWSB)

TO: Robert Nunes, Remedial Project Manager
New York Remediation Branch (ERRD-NYRB)

As per your request, we have reviewed the "Preliminary Site Assessment Report, North and South Landfills, Crouse-Hinds Facility" dated September 29, 2004 and prepared by InteGreyted International, LLC for the Cooper Industries, Inc. Site located in the Town of Salina and the City of Syracuse, Onondaga County, New York. We provide the following comments.

Undeveloped woods, wetlands and mixed commercial development border the North Landfill to the south; wetlands followed by Ley Creek are present to the west of the Site. The west boundary of the South Landfill is immediately adjacent to Ley Creek. During the hydrogeologic investigation, water level measurements indicated a general flow direction in the shallow aquifer to the west and southwest toward Ley Creek. Seasonal variations were noted. In the deeper aquifer the general groundwater flow direction was to the east during the summer months and to the west during the winder months. Any leachate produced by the landfill should flow through the peat layer toward Ley Creek; the vertical migrations would be inhibited by the silt and clay unit.

Comments

A site figure which clearly shows the location of the wetland areas and any ponded areas on site should be included in this document.

Figure 2-1: Ley Creek should clearly be shown adjacent to the South Landfill, similar to what is illustrated for the North Landfill. Please note how sample locations were selected (i.e., surface runoff, visible leachate, depositional areas, etc.). In general it is recommended that samples be collected away from anthropogenic sources, specifically it appears as if sed/sw samples SED-2/SW-2 and SED-3/SW-3 could have been impacted by site runoff from Seventh North Street.

Section 2.3.1, Test Pit Excavation Soil Sampling, page 2-5, Section 2.3.2 Surface Soil Sampling, page 2-6: Please note whether samples were analyzed for the full TCL.

Section 2.3.2 Surface Soil Sampling, page 2-6: Please indicate the depth of surface soil samples, and note whether surface soil samples were collected from leachate release areas, drainage swales or other visually impacted areas.

Section 2.3.3 Leachate Sampling, page 2-6: It appears that surface soil samples SS-4 and SS-6 may be sediment samples if they were collocated with leachate samples L-1 and L-2 respectively. Please note whether leachate samples underwent TCL analysis.

Section 2.4 Ley Creek Sampling, page 2-7: Figure 2-1 should provide the location of SW-6. It should be indicated why only sediment was collected from SED-6. Sediment samples are labeled "SED" rather than "SW;" this should be corrected. Please indicate whether sediment samples underwent grain size and TOC analysis and whether surface water samples were analyzed for hardness. These data are necessary to properly screen contaminants against screening values.

Section 3.1 Data Evaluation, page 3-1 and Section 3.4.2 Surface Soil Analytical Results, page 3-14: In order to determine whether surface soil samples may impact ecological receptors, soil screening guidelines protective of the environment should be used. Appropriate soil screening values are EPA's Ecological Soil Screening Levels (SSLs) (http://www.epa.gov/ecotox/ecossl/); Efroymson, R.A., G.W. Suter, II, B.E. Sample and D.S. Jones. 1997. Preliminary Remediation Goals for Ecological Endpoints. Oak Ridge National Laboratory, Oak Ridge, TN and the Sample, B.E., D.M. Opresko, and G.W Suter II. 1996. Toxicological Benchmarks for Wildlife: 1996 Revision. Oak Ridge National Laboratory, Oak Ridge, TN. (http://www.esd.ornl.gov/programs/ecorisk/contaminated_sites.html#reports.)

Section 3.4.3 Sediment Analytical Results, page 3-20 (first bullet): It appears that there is an increase in contaminant concentrations from upstream to downstream - SVOCs and VOCs (Table 3-6).

Section 3.4.3 Sediment Analytical Results, page 3-20 (second bullet): This pesticide (gamma-BHC) was also identified in SED-5 which is a duplicate of SED-3.

Section 3.4.4 Surface Water Analytical Results, page 3-20: Please indicate why surface water samples were not collected from sample location SED-6.

Section 3.4.5 Leachate Analytical Results, page 3-23: It may make sense to discuss the leachate samples in context with the soil/sediment samples (SS-4 & SS-6) which were collected from the same location.

Section 3.5 FWIA Results, page 3-26: The value of the habitat to ecological receptors needs to be better addressed and the potential for contaminants to get into the food chain or to cause direct or indirect toxicity should be the focus of the ecological portions of the report. The additional sampling proposed should address these concerns.

It should be noted that a wetlands assessment and restoration plan will be needed for any wetlands impacted or disturbed by the remedial activities (Clean Water Act Section 404, Protection of Wetlands E.O. 11990, 40 CFR 6 App A). Additionally, whenever possible, Management Practices (according to Federal Register Vol. 51, No. 219, Part 330.6) should be followed to minimize unavoidable impacts (e.g., spread of contaminants, roadways) to wetlands to the maximum extent practicable while designing/implementing the remedy. Should you require additional information regarding wetland issues, the BTAG and/or John Cantilli (212-637-3810) of the Water Programs Branch are available for assistance.

Section 4.1 Soil Investigation, page 4-2, second bullet: It is recommended that any further delineation of the fill material include sampling in the wetlands areas as well as "acres of low-lying ponded water."

Section 4.1 Soil Investigation, page 4-4: As noted above, surface soil results should be discussed in context of ecological soil screening values in addition to TAGM exceedances.

Section 4.2 Hydrogeologic Investigation, page 4-6: In the first bullet on the page the presence of free floating product (NAPL) needs further discussion and delineation. The hypothesis that well MW-5 is the source of the NAPL should be confirmed. In the second to last bullet on the page the statement that

metals in the groundwater "showed no discernable differences in concentrations or distribution" should be supported by providing upgradient and background values. Also, this statement seems to contradict the next bullet which states that the downgradient areas of the Site are impacted by VOCs, SVOCs and metals. This should be clarified.

Section 4.3 Surface Water Investigation, pages 4-7 - 4-8: The last bullet indicates that there is the potential for leachate to discharge to a ponded area and a swale. Therefore the impacts of the leachate to ecological receptors should be assessed (using appropriate surface water and sediment screening values). It should be noted whether there is a groundwater to surface water pathway at the site. Further, contaminants may enter Ley Creek during flooding, when the banks of the creek overflow and potential contaminated soil may enter the Creek.

Section 4.4 Sediment Investigation, page 4-10: The likely source of PCBs needs to be better documented.

Section 4.6 Recommendations, page 4-11: Groundwater samples to assist in determining whether there is a groundwater to surface water pathway should also be collected. Information and figures regarding the wetland areas as included in Attachment 4, "Fish and Wildlife Impact Assessment" should be provided in the main body of this report and used when selecting sediment and surface water sample locations. A better discussion of the surface hydrology (wetlands, drainage ditches and the potential for surface water runoff) would be helpful, especially as to how it may impact ecological resources.

Section 4.6 Recommendations, page 4-12: The extent of free product in the vicinity of well MW-5 needs to be addressed (third bullet). Taking into account the data gaps identified, the last bullet (indicating that the site is not a source of contamination to Ley Creek and Onondaga Lake) should be removed, until additional information has been collected

Attachment 4, Fish and Wildlife Impact Assessment: A better copy of Figure 9 should be provided to reviewers so that the drainage channels and drainage patters may be better identified. This information will be very useful to identify sample locations to address data gaps. The information regarding wetlands provided under "Vegetation Summary" (page 8) seems to be in conflict with previous figures which illustrate the locations of the wetland areas.

We hope these comments have been helpful. The BTAG and/or DESA would like the opportunity to review any future workplans prepared to address the data gaps identified in this report. If you have any questions, comments, or require further information, please contact me at (732) 321-6705.

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